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COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

AUG 3 1 1993

IN THE MATTER OF:) PUBLIC SERVICE COMMISSION
DONNA WARD, COMPLAINANT))
vs.	No. <u>43-3/9</u>
UNION LIGHT, HEAT & POWER, DEFENDANT))

COMPLAINT

The complaint of Donna Ward respectfully shows:

- a) Donna Ward, unemployed, resides at 199 Short May Street, Elsmere, Kentucky 41018;
- b) The Defendant is the Union Light, Heat and Power Company (ULH&P), 107 Brent Spence Square, Covington, Kentucky 41011;
- c) That Donna Ward applied for gas and electric service from ULH&P but was denied service because she was indebted to the Cincinnati Gas and Electric Company (CG&E) for service supplied to her at 8967 Neptune Drive, Cincinnati, Ohio in 1990 in the amount of \$1881.34;
 - d) That Donna Ward denies being indebted to ULH&P;
- e) That ULH&P's refusal to provide service to Donna Ward when she is not indebted to ULH&P is a violation of Kentucky P.S.C. Regulations, 807 KAR 5:006, Section 14(1) and KRS 278.030;

WHEREFORE, Complainant Donna Ward asks:

1. That the PSC assume jurisdiction of this billing dispute and, pursuant to 807 KAR 5:006, Section 11,

order ULH&P to cease refusing service during the pendency of this case:

2. That the PSC order ULH&P to refrain from collecting debts owed to other companies.

Dated at Covington, Kentucky this 301

1993.

COMPLAINANT

MELCHER

ATTORNEY FOR COMPLAINANT Northern Kentucky Legal Aid Society, Inc. 302 Greenup Street

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